

ORIGINAL

RECEIVED

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

AUG 27 1992

Federal Communications Commission  
Office of the Secretary

In the Matter of  
Billed Party Preference  
for 0+ InterLATA Calls

)  
)  
)  
)

CC Docket No. 92-77

ORIGINAL  
FILE

REPLY

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its responsive comments in the above-referenced matter. As evidenced by the record compiled to date in this proceeding, most parties concur in the assessment that introduction of billed party preference (BPP) routing at this time would not advance the public interest. Further, the comments reveal an unusual degree of consensus among parties as to the recommended extent of BPP service deployment (if mandated by the Commission) and the necessity for adequate mechanisms to insure BPP cost recovery.

DISCUSSION

BellSouth's comments, filed July 7, 1992, detailed certain earlier practices in the operator services industry which generated a high degree of consumer dissatisfaction and motivated the initial proposal of BPP in 1987. BellSouth showed that many of these abuses have since been addressed through legislative and regulatory action which has profoundly changed the character of the operator services industry. In addition, new LEC service offerings

No. of Copies rec'd  
List A B C D E

0 + 10 4

such as Operator Transfer Service (OTS) have contributed significantly to the expansion of consumer options and the creation of a more competitive market. Further, the Commission has the opportunity in a related proceeding to extend these beneficial effects by ordering all calling card issuers to provide validation and screening services on reasonable and nondiscriminatory terms.<sup>1</sup>

Notwithstanding their divergent interests on some issues, numerous parties concur in the basic proposition that BPP is no longer requisite to the creation of a competitive operator services industry.<sup>2</sup> Others express uncertainty that any public interest benefits achievable through BPP warrant the considerable expenditure which would be necessary for service deployment.<sup>3</sup> In light of such reservations, which are extensively documented in the record, the Commission would be justified in declining to

---

<sup>1</sup> See Billed Party Preference for 0+ InterLATA Calls, CC Docket No. 92-77, BellSouth Comments, filed June 2, 1992; BellSouth Reply, filed June 17, 1992.

<sup>2</sup> "[S]ince the filing of the [Bell Atlantic] Petition the Congress and the Commission have taken numerous and significant steps to cure any of the problems attendant to the operator services industry that BPP may tend to cure." Opticom, pp. 2-3. "[C]hanges in the composition of operator services traffic, developments in the intensely competitive calling card marketplace, and regulatory initiatives by the Commission have significantly increased customers' already considerable ability to control the selection of the IXCs that will handle their calls." AT&T, pp. 5-6.

<sup>3</sup> SWBT, p. 22; NYNEX, p.3.

mandate BPP implementation at this time.<sup>4</sup>

Parties commenting on the parameters of a BPP service overwhelmingly favor its application to all aggregators and all 0+ and 0- interLATA traffic.<sup>5</sup> Indeed, any less comprehensive plan would forfeit one of the major advantages of BPP: its potential to afford equal access through a convenient and familiar dialing pattern which can be implemented at every telephone station. As observed in BellSouth's initial comments, universal application of BPP would require the Commission to develop an alternative mechanism for compensating non-LEC providers of pay telephone equipment, who currently receive revenue through commissions paid by the presubscribed carrier. This issue can be addressed in a separate proceeding; it should not, however, be a factor in delineating the scope of any BPP service mandated by the Commission.

Finally, LECs are unanimous in their assessment that the costs of BPP implementation will be substantial. Moreover these costs, mainly attributable to software

---

<sup>4</sup> Perhaps the most unconditional support for BPP is found in comments submitted by MCI. Even here, however, MCI's position is driven less by any conviction regarding the ultimate merits of BPP deployment and more by the continuing refusal of AT&T to provide validation and screening services for its CIID card. As previously noted, the Commission can address MCI's complaint in a far more direct and efficacious manner than through ordering deployment of BPP (see p. 2 and note 1, supra).

<sup>5</sup> BPP "must be mandatory and ubiquitous." Bell Atlantic, p. 1. See also MCI, p. 6; USTA, p. 7; Illinois Commerce Commission et al., p. 11.

modifications, will not vary significantly with changes in demand level. It is thus imperative that LEC providers of BPP be assured of an adequate mechanism for cost recovery. In the view of BellSouth and several other LECs, this mechanism will necessarily entail contribution from all users of the public switched network, in order to defray the substantial costs of BPP and assure a commercially viable service.

**CONCLUSION**

BellSouth asks the Commission to adopt findings in this proceeding which are consistent with the views expressed herein and in the initial comments of BellSouth, filed July 7, 1992.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: Helen A. Shockey  
William B. Barfield  
Richard M. Sbaratta  
Helen A. Shockey

Its Attorneys

1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, Georgia 30367-6000

August 27, 1992

CC DOCKET NO. 92-77

U S West Communications, Inc.  
Lawrence E. Sarjeant  
Randall S. Coleman  
1020 19th Street, N.W.  
Suite 700  
Washington, D.C. 20036

Southwestern Bell Tele. Co.  
Durward D. Dupre  
Richard C. Hartgrove  
John Paul Walters, Jr.  
1010 Pine Street, Room 2114  
St. Louis, MO 63101

Northwest Pay Phone Assoc.  
Douglas N. Owens  
4705 16th Avenue, N.E.  
Seattle, Washington 98105

Wiley, Rein & Fielding  
Richard E. Wiley  
Danny E. Adams  
1776 K Street, N.W.  
Washington, D.C. 20006  
Attorneys for Competitive  
Telecommunications Assoc.

Jean L. Kiddoo  
Swidler & Berlin, Chtd.  
3000 K Street, N.W.  
Washington, D.C. 20007  
Counsel for Zero Plus  
Dialing, Inc.

Sutherland, Asbill & Brennan  
Attorneys for  
Capital Network System, Inc.  
Randolph J. May  
David A. Gross  
1275 Pennsylvania Ave, N.W.  
Washington, D.C. 20004-2404

Sprint Communications Co.  
Leon M. Kestenbaum  
H. Richard Juhnke  
1850 M Street, N.W., 11th Flr  
Washington, D.C. 20036

Swidler & Berlin, Chtd.  
Jean L. Kiddoo  
Ann P. Morton  
3000 K Stret, N.W., Ste 300  
Washington, D.C. 20007  
Counsel for Cleartel  
Communications, Inc. and  
Com Systems, Inc.

Mitchell F. Brecher  
Dow, Lohnes & Albertson  
1255 23rd Street, N.W.  
Washington, D.C. 20554  
Attorneys for  
Phonetel Technologies, Inc.

NYNEX  
William J. Balcerski  
Patrick A. Lee  
120 Bloomingdale Road  
White Plains, NY 10605

Albert H. Kramer  
Robert F. Aldrich  
Kech, Mahin & Cate  
1202 New York Ave., N.W.  
Penthouse Suite  
Washington, D.C. 20005-3919  
Attorneys for American Public  
Communications Council

U.S. Long Distance, Inc.  
W. Audie Long, Esq.  
Kenneth F. Melley, Jr.  
9311 San Pedro, Suite 300  
San Antonio, TX 78216

Ameritech Operating Co.  
Floyd S. Keene  
Michael S. Pabian  
Room 4H76  
2000 West Ameritech Ctr. Dr.  
Hoffman Estates, IL 60196

MCI Telecommunications Corp.  
Mary J. Sisak  
Donald J. Elardo  
1801 Pennsylvania Ave, N.W.  
Washington, D.C. 20006

National Telephone  
Cooperative Assoc.  
David Cosson  
2626 Pennsylvania Ave, N.W.  
Washington, D.C. 20037

SDN User's Association, Inc.  
Larry Moreland  
c/o Caterpillar, Inc.  
600 W. Washington St., AD341  
East Peoria, IL 61630

International  
Telecharge, Inc.  
Jane A. Fisher  
Greg Casey  
6707 Democracy Blvd.  
Bethesda, MD 20817

AT&T  
Francine J. Berry  
Mark C. Rosenblum  
295 North Maple Avenue  
Room 3244J1  
Basking Ridge, NJ 07920

LDDS Communications, Inc.  
Catherine R. Sloan  
1825 I Street, N.W.  
Suite 400  
Washington, D.C. 20006

Pacific Bell  
Nevada Bell  
James P. Tuthill  
Nancy C. Woolf  
140 New Montgomery Street  
Room 1523  
San Francisco, CA 94105

Glenn B. Manishin  
Blumenfeld & Cohen  
1615 M Street, N.W.  
Suite 700  
Washington, D.C. 20036  
Attorney for Value-Added  
Communications, Inc.

Law Office of John A. Ligon  
128 Mount Hebron Avenue  
Post Office Box 880  
Upper Montclair, NJ 07043  
Attorney for Comtel Computer  
Corporation

USTA  
Martin T. McCue  
Linda Kent  
900 19th Street, NW,  
Suite 800  
Washington, D.C. 20006-2105

GTE Service Corporation  
Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036

ATC  
Douglas F. Brent  
10000 Shelbyville Road  
Louisville, KY 40223

Bell Atlantic Telephone Co.  
John M. Goodman  
1710 H Street, N.W.  
Washington, D.C. 20006

WilTel, Inc.  
Bob F. McCoy  
Joseph W. Miller  
P. O. Box 2400  
One Williams Center,  
Suite 3600  
Tulsa, OK 74102

James B. Gainer  
Ann E. Henkener  
Public Utilities Commission  
of Ohio  
Public Utilities Section  
180 East Broad Street  
Columbus, Ohio 43266-0573

California Payphone Assoc.  
Martin A. Mattes  
Richard L. Goldbert  
Graham & James  
One Maritime Plaza, Suite 300  
San Francisco, CA 94111

TDS Telecommunications Corporation  
Margot Smiley Humphrey  
Koteen & Naftalin  
1150 Connecticut Avenue, NW  
Washington, DC 20036

NYCOM Information Services  
Amy S. Gross  
2701 Summer Street,  
Suite 200  
Stamford, CT 06905

Intellicall, Inc.  
Judith St. Ledger-Roty  
Michael R. Wack  
Reed Smith Shaw & McClay  
1200 18th Street, N.W.  
Washington, D.C. 20036

The Colorado Office of  
Consumer Counsel  
Ronald J. Binz  
1580 Logan Street,  
Suite 700  
Denver, Colorado 80203

John A. Ligon  
Counsellor at Law  
128 Mount Hebron Road  
P. O. Box 880  
Upper Montclair, NJ 07043

Alternate Communications  
Technology, Inc.  
H. William Orr  
8802 North Meridian Street  
Suite 103  
Indianapolis, IN 46260

Norfolk Airport Authority  
Kenneth R. Scott  
Norfolk, VA 23518-5897

Public Utility Commission  
of Texas  
Marta Greytok  
Robert W. Gee  
Karl R. Rabago  
7800 Shoal Creek Boulevard  
Suite 400N  
Austin, TX 78759

Representative Bob Starks  
Florida House of Representatives  
1312 Palmetto Avenue  
Winter Park, FL 32789

Lubbock International Airport  
Bern E. Case  
Route 3, Box 389  
Lubbock, TX 79401



Advanced Business Communications  
John B. Mow  
4801 Spring Valley  
Suite 105A  
Dallas, TX 75244

Advanced Payphone Systems  
Steve Schude  
535 W. Iron Avenue  
Suite 122  
Nesa, Arizona 85210

Airport Authority of  
Washoe County  
Robert C. White  
Reno Cannon International Airport  
Reno Stead Airport  
Box 12490  
Reno, NV 89510

Missouri Public Service  
Commission  
Colleen M. Dale  
302 West High  
Jefferson City, MO 65102

RCI Long Distance, Inc.  
Josephine S. Trubek  
Rochester Tel Center  
180 South Clinton Avenue  
Rochester, NY 14646-0700

Polar Communications Corp.  
Mark W. Kelly  
Thomas W. Wilson  
300 Corporate Center Drive  
Manalapan, NJ 07726

LiTel Telecommunications Corp.  
James D. Heflinger  
d/b/a LCI International  
4650 Lakehurst Court  
Dublin, OH 43017

Sharenet Communications Co.  
Gary Joseph  
4633 West Polk Street  
Phoenix, Arizona 85043

Harvard University  
Office for Information Technology  
Maurice D. Murphy  
10 Ware Street  
Cambridge, MA 02138

LinkUSA Corporation  
Steven J. Hogan  
230 2nd Street, SE  
Suite 400  
Cedar Rapids, Iowa 52401

U. S. Intelco Networks, Inc.  
Stephen G. Kraskin  
2120 L Street, N.W.  
Suite 300  
Washington, DC 20037

Illinois Commerce Commission  
Darrell S. Townsley  
180 North LaSalle Street  
Suite 810  
Chicago, IL 60601

Michigan Public Service  
Commission  
Ronald G. Choura  
Olga Lozano  
Telecommunications Section  
Policy Division  
P. O. Box 30221  
Lansing, Michigan 48909-7721

OPASTCO  
Lisa M. Zaina  
2000 K Street, NW  
Suite 205  
Washington, DC 20006

American Telemanagement, Inc.  
525 N. Lindenwood  
Olathe, KS 66062

John F. Dodd  
Brad I. Pearson  
Smith, Gill, Fisher & Butts  
One Kansas City Place  
1200 Main Street, 35th Floor  
Kansas City, MO 64105-2152  
Attorneys for  
American Telemanagement, Inc.

Midwest Independent Coin  
Payphone Association  
William M. Barvick  
231 Madison Street  
Jefferson City, MO 65101

Pennsylvania Public Utility  
Commission  
Ellen M. Averett  
Veronica A. Smith  
John F. povilaitis  
P. O. Box 3265  
G-28, North Office Bldg.  
Harrisburg, PA 17105-3265

Independent Telecommunications,  
Network, Inc.  
Gilbert/Robinson Plaza  
Two Brush Creek Blvd., Ste. 400  
P. O. Box 30210  
Kansas City, MO 64112

American Hotel and Motel  
Association  
Brian J. Kinsella  
Thomas F. Youngblood  
1201 New York Avenue, NW  
Washington, DC 20005-3931

John F. Dodd  
Brad I. Pearson  
Smith, Gill, Fisher & Butts  
One Kansas City Place  
1200 Main Street, 35th Floor  
Kansas City, MO 64105-2152  
Attorneys for  
Independent Telecommunications,  
Network, Inc.

Allnet Communication  
Services, Inc.  
Roy L. Morris  
1990 M Street, NW  
Suite 500  
Washington, DC 20036

The City of New York  
Dept. of Telecommunications  
and Energy  
Eileen E. Huggard  
75 Park Place, 6th Floor  
New York, NY 10007

MessagePhone, Inc.  
Douglas E. Neel  
5910 N. Central Expressway  
Suite 1575  
Dallas, TX 75206

Airports Association Council  
International - NA  
Barney C. Parrella  
Economics and Int'l Affairs  
1220 19th Street, N.W.  
Suite 200  
Washington, DC 20036

Alan J. Thiemann  
Taylor Thiemann & Aitken  
908 King Street  
Suite 300  
Alexandria, VA 22314  
Attorney for the  
National Association of  
Convenience Stores

Division of Information  
Resource Management  
Reed Smith Shaw & McClay  
1200 18th Street, NW  
Washington, DC 20036

Arizona Department of  
Corrections  
Stanley F. Bates  
1601 West Jefferson Street  
Phoenix, Arizona 85007-3003

Independent Payphone Assoc.  
of New York, Inc.  
Keith J. Roland  
Roland, Fogel, Koblenz & Carr  
One Columbia Place  
Albany, NY 12207

Ian D. Volner  
Cohn and Marks  
Suite 600  
1333 New Hampshire Ave., NW  
Washington, DC 20036  
Counsel for Airports Assoc.  
Council International - NA

Southern New England  
Telephone Company  
Rochelle d. Jones  
227 Church Street-4th Floor  
New Haven, Connecticut 06510

Jones, Day, Reavis & Pogue  
Randall B. Lowe  
Charles H. N. Kallenbach  
1450 G Street, N.W.  
Washington, D.C. 20005-2088  
Attorneys for  
One Call Communications, Inc.

Morrison & Foerster  
Debra L. Lagapa  
Mary K. O'connell  
2000 Pennsylvania Ave., N.W.  
Suite 5500  
Washington, D.C. 20006  
Attorneys for MasterCard  
International Incorporated and  
VISA, U.S.A., Inc.

Law Office of John Ligon  
John A. Ligon  
128 Mount Hebron Avenue  
Post Office Box 880  
Upper Montclair, NJ 07043  
Attorney for  
ComTel Computer Corporation

Nixon, Hargrave, Devans & Doyle  
Veronica M. Ahern  
Suite 800  
One Thomas Circle  
Washington, D.C. 20005  
Attorneys for  
Illinois Department of Central  
Management Services, Bureau of  
Communications & Computer Services

Sutherland, Asbill & Brennan  
Randolph J. May  
Elizabeth C. Buckingham  
1275 Pennsylvania Ave., N.W.  
Washington, D.C. 20004-2404  
Attorneys for  
Advanced Technologies Cellular  
Telecommunications, Inc.

The Teltronics Group  
John W. Priest  
2150 Whitfield Industrial Way  
Sarasota, FL 34243-4046

Memphis-Shelby County  
Airport Authority  
Jerry L. McMichael  
P. O. Box 30168  
Memphis, TN 38130-0168

Keck,, Mahin & Cate  
Albert H. Kramer  
Robert F. Aldrich  
1201 New York Avenue, N.W.  
Penthouse Suite  
Washington, D.C. 20005  
Attorneys for the North American  
Telecommunications Association

ComCentral Corp.  
John W. Priest  
2150 Whitfield Industrial Way  
Sarasota, FL 34243-4046

City of Fresno Department  
of Airports  
Krys T. Bart  
2401 N. Ashley Way  
Fresno, CA 93727-1504

Wisconsin Department of  
Corrections  
Pamela J. Brandon  
P. O. Box 7925  
Madison, WI 53707

Department of Administrative  
Services  
Telecommunications Division  
George A. Christenberry, Jr.  
200 Piedmont Avenue  
Suite 1402, West Tower  
Atlanta, GA 30334-5540

Utah Department of Corrections  
O. Lane McCotter  
6100 South 300 East  
Murray, Utah 84107

Clark County  
Department of Aviation  
Robert N. Broadbent  
McCarran International Airport  
P. O. Box 11005  
Las Vegas, Nevada 89111

Florida Public Service Comm.  
William E. Wyrrough, Jr.  
101 East Gaines Street  
Tallahassee, FL 32399-0850

South Carolina Jail  
Administrators Association  
Perry R. Eichor  
P. O. Box 10171  
Greenville, SC 29603

Keck, Mahin & Cate  
Albert H. Kramer  
Robert F. Aldrich  
1201 New York Avenue, N.W.  
Washington, D.C. 20005-3919  
Attorneys The Inmate Calling  
Service Providers - Task Force  
of The American Public  
Communications Council

Montana State University  
Patricia A. Simmons  
Office of Systems and  
Computing Services  
Renne Library Basement  
Bozeman, MT 59717-0324

American Jail Association  
Richard G. Kiebusch  
1000 Day Road, Suite 100  
Hagerstown, MD 21740

Fish & Richardson  
Steimel, Jr., Esq.  
601 13th Street, N.W.  
Fifth Floor North  
Washington, D.C. 20005  
Attorneys for  
Pilgrim Telephone, Inc.

Ohio Department of Walter  
Rehabilitation and Correction  
Eric G. Dahlberg  
1050 Freeway Drive, North  
Columbus, OH 43229

Elcotel, Inc.  
Ms. Karen M. DeYoung  
6428 Parkland Drive  
Sarasota, FL 34243

Call America  
Business Communications  
Kellie Cooke  
879 Morro Street  
San Luis Obispo, CA 93401

North Carolina Department  
of Correction  
W. L. Kautzky  
214 West Jones Street  
Raleigh, NC 27603-1337

South Carolina Sheriffs'  
Association  
Jeffrey B. Moore  
P. O. Box 21428  
Columbia, SC

City of Mesa  
Daniel Brewer  
59 East First Street  
P. O. Box 1466  
Mesa, AZ 85211-1466

Phone Home Enterprises  
Scott Stutman  
P. O. Box 599  
Wetwood, NJ 07675

Hospitality Communications, Inc.  
800 Jesse Jewell Parkway  
P. O. Box 1018  
Gainesville, GA 30503

Charter Pines Hospital  
Glenn E. Hamilton  
3621 Randolph Road  
Charlotte, NC 28211

Plaza at Latham Associates  
Sue Ellen Weiser  
800-19 New Loudon Road  
Latham, NY 12110

Youngs Food Stores, Inc.  
Bill Mazonkey  
P. O. Box 1000  
Sumter, SC 29151-1000

Eastern Telephone Company, Inc.  
Darrell L. Maynard  
881 North Mayo Trail  
Pikeville, KY 41502-1138

Cedar Rapids  
Commissioner of Streets  
and Public Improvements  
Wayne A. Murdock  
Third Floor, City Hall  
Cedar Rapids, IA 52401

Walter C. Heinrich, Sheriff  
Hillsborough County  
Tampa, FL 33601

Department of Disaster and  
Emergency Services  
Jill Gibbons  
City Hall, Room 113  
Louisville, KY 40202

Hotelco  
Brooks H. Haden  
20 Sunnyside Avenue  
Suite 223  
Mill Valley, CA 94941

Properties, Inc.  
Shirley Richards  
8963 E. Tanque Verde Road  
Box 116  
Tucson, AZ 85749

Leonard Polan, Architect  
31755 Bedfordhurst Court  
Westlake Village, CA 91361

Ms. Phoebe Czikra  
3313 Doris Place  
Anchorage, Alaska 99517

Mr. Bruce G. Marlowe  
38185 Columbine Place  
Newark, CA 94560-4624

Bella Lumm  
999 N. Caribe  
Tucson, AZ 85710

National Telephone Company  
John F. Nort  
5445 Spalding Drive  
Norcross, GA 30092

Superior Electronics  
David G. Carter  
Rt. 2, Box 121-1  
Timmons ville, SC 29161

Cox Enterprises, Inc.  
105357  
Atlanta, Georgia 30348

National Sheriff's P. O. Box  
Association  
Charles Meeks, Exec. Dir.  
1450 Duke Street  
Alexandria, VA 22314

City of Kansas City, Missouri  
Michael Walker  
Telecommunications Manager  
3rd Floor, City Hall  
Kansas City, Missouri 64106-2787

Barkman Oil Company, Inc.  
Arlan D. Barkman  
P. O. Box 175  
Woodbury, PA 16695-0175

San Diego Payphone Owners Assoc.  
Ken Scott  
Telco Relations Committee  
P. O. Box 1265  
La Mesa, CA 91944

Little Rock Regional Airport  
James R. Rodgers  
Adams Field  
#1 Airport Drive  
Little Rock, AK 72202-4489



The City of Fayetteville, AK  
Dale Frederick  
Airport Manager  
113 West Mountain  
Fayetteville, AK 72701

Huntsville Madison County  
Airport Authority  
Luther H. Roberts, Jr.  
1000 Glenn Heard Blvd.  
Box 20008  
Huntsville, AL 35824

Petro PSC, L.P.  
Travis Roberts  
P. O. Box 26808  
El Paso, TX 79926

Valley International Airport  
Jon E. Mathiasen  
Airport Terminal Building  
Harlingen, TX 75550

Beatty Restaurant Ent., Inc.  
D/B/A McDonald's #2881,3050,5342  
P. O. Box 543  
DuBois, PA 15801

D. C. Petroleum, Inc.  
Arlie Clinkenbeard  
P. O. Box 7787  
Missoula, Montana 59807

Department of Administration  
Information Services Division  
State of Montana  
Jim White, Manager  
Telecommunications Policy & Dev.  
Room 221, Mitchell Building  
Helena, Montana 59620

National Association of  
Regulatory Utility Comm.  
James Bradford Ramsay  
1102 Interstate Commerce  
Commission Building  
Constitution Ave. and  
12th Street, N.W.  
Washington, D.C. 20423

State of Iowa  
Department of Corrections  
Paul W. Grossheim, Director  
Capitol Annex  
523 East 12th  
Des Moines, Iowa 50319

County of Racine  
Dennis Kornwolf  
County Executive  
Racine County Courthouse  
730 Wisconsin Avenue  
Racine, Wisconsin 53403

City of Miami  
Department of General Services  
Administration and Solid Waste  
Ron E. Williams, Administrator  
1390 N. W. 20 Street  
Miami, FL 33142

State of California -  
Youth and Adult Correctional  
Agency  
Department of Corrections  
Sandra Duveneck  
P. O. Box 942883  
Sacramento, CA 94283-0001

State of Wyoming  
Department of Corrections  
John King, Director  
P. O. Box 41106  
Olympia, Washington 98504-1106

Pennsylvania Public Utility  
Ellen M. Averett  
Veronica A. Smith  
John F. Povilaitis  
P. O. Box 3265  
G-28 North Office Building  
Harris, PA 17105-3265

The Wichita Airport Authority  
Dwight W. Greenlee  
2173 Air Cargo Road  
P. O. Box 9130  
Wichita, Kansas 67277-0130

Department of Corrections  
and Human Resources  
James M. Gamble  
1539 11th Avenue  
Helena, Montana 59620-1301

South Carolina Correctional  
Association  
William D. Catoe, President  
P. O. Box 210603  
Columbia, SC 29221

Citizens Utilities  
Ellen S. Deutsch  
1035 Placer Street  
Redding, California 96049

Central Virginia Regional Jail  
Sterling C. Proffitt  
13021 James Madison Highway  
P. O. Box 1257  
Orange, VA 22960

Southland Corporation  
Ron Doughty  
Cityplace Center East  
2711 North Haskell Avenue  
Dallas, TX 75204-2906

Orange County  
Richard A. Wood  
Telecommunications  
109 East Church Street,  
Suite 230  
P. O. Box 1393  
Orlando, FL 32802-1393

General Services Commission  
1711 San Jacinto  
P. O. Box 13047  
Austin, TX 78711-3047

Greenville-Spartanburg  
Airport Commission  
Roger Milliken, Chairman  
2000 GSP Drive,  
Suite 1  
Greer, SC 29651-9202

Port of Seattle  
Karl D. Myers  
Seattle-Tacoma  
International Airport  
P. O. Box 68727  
Seattle, WA 98168

Eastmac  
McDonald's #3736  
John Eastman, Owner  
R. C. #4  
Box 247-A, Route 22  
Huntington, PA 16652

Ohio Department of  
Administrative Services  
Division of Computer Services  
Timothy D. Steiner  
30 East Broad Street  
Columbus, OH 43266-0409

Washington State Jail Assoc.  
Captain John A. Goldman,  
Jail Commander  
Spokane County Sheriff Dept.  
Jail Division  
West 1100 Mallon Avenu  
Spokane, WA 99260-0300

Government of the District  
of Columbia  
Department of Corrections  
Walter B. Ridley, Director  
Suite N-203  
1923 Vermont Avenue, N.W.  
Washington, D.C. 20001

Pay-Tel Corporation  
Mark A. Alberti  
45 West Tupper Street  
Buffalo, NY 14202

Firstel Systems, Inc.  
Edgar J. Lopez  
2037 Route Nine  
Round Lake, NY 12151

County of Lehigh  
Department of Corrections  
Lehigh County Prison  
Dale A. Meisel  
38 North Fourth Street  
Allentown, PA 18102

Idaho Sheriffs' Association  
Lewis Pratt, President  
Box 1623  
Boise, Idaho 83701

Commonwealth of Kentucky  
Department of Parks  
Mark A. Lovely  
Capital Plaza Tower  
500 Mero Street, 11th Floor  
Frankfort, KY 40601-1974

The Public Service Commission  
State of South Carolina  
Marsha A. Ward  
P. O. Drawer 11649  
Columbia, SC 29211

State of New York  
Department of Public Service  
William J. Cowan  
Three Empire State Plaza  
Albany, NY 12223

American Jail Association  
Richard G. Kiekbusch  
1000 Day Road, Suite 100  
Hagerstown, MD 21740

Blumenfeld & Cohen  
B. Manishin  
1615 M Street, N.W.  
Suite 700  
Washington, D.C. 20036  
Attorneys for  
Gateway Technologies

Florida Department of Glenn  
Corrections  
Harry K. Singletary, Jr.  
2601 Blairstone Road  
Tallahassee, FL 32399-2500

Country Fair, Inc.  
Paul T. Levis, Vice President  
2251 East 30th Street  
Erie, PA 16510

State of New Jersey  
Board of Regulatory  
Commissioners  
Dr. Edward H. Salmon  
CN 350  
Trenton, NJ 08625-0350

Great Falls International  
Airport Authority  
M. J. Attwood, AAE  
2800 Terminal Drive  
Great Falls, MT 59404-5599

The Pantry, Inc.  
Wayne Foushee  
Administrative Mgr  
P. O. Box 1410  
1801 Douglas Drive  
Sanford, NC 27331-1410

Bel Air Mall  
Roy V. Taylor, CSM  
3299 Bel Air Mall  
Mobile, AL 36606-3202

Triton, Inc.  
L. E. Blubaugh, II  
VP, Stores Marketing  
P. O. Box 47276  
Atlanta, GA 30362

Mr. Philip A. Messina  
32 Windsor Road  
Rye Brook, New York

Quik Chek Food Stores  
Winston Dozier,  
Operations Manager  
220 West Spring Street  
Troy, NC 27371

Abloy Security Group  
Charlie Armstrong,  
General Manager  
P. O. Box 35406  
Dallas, TX 75235

Oregon Department of  
Corrections  
Institutions Branch  
Denis Dowd, Asst. Dir.  
2575 Center Street, NE  
Salem, OR 97310-0470

State of Utah  
Department of Corrections  
Utah State Prison  
C. Kim Thompson, Director  
P. O. Box 250  
Draper, UT 84020

City of Abilene  
Jim C. Blagg  
City Manager  
P. O. Box 60  
555 Walnut  
Abilene, TX 79604

**CERTIFICATE OF SERVICE**

I, SHEILA BONNER, hereby certify that copies of the foregoing document were served by mailing true copies by First Class, United States Mail, postage prepaid to the persons listed on the attached service list.

This the 27th day of August, 1992.

Sheila Bonner  
Sheila Bonner